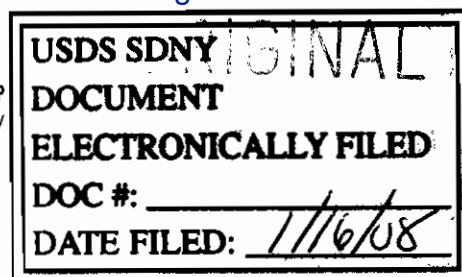


BLANK  ROME LLP
COUNSELORS AT LAW



Phone: (212) 885-5148

Fax: (917) 332-3838

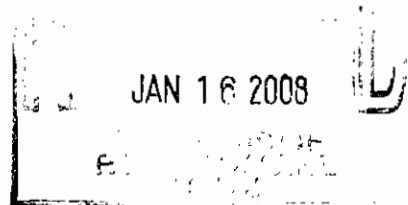
Email: LLambert@BlankRome.com

MEMO ENDORSED

January 16, 2008

BY HAND

Honorable P. Kevin Castel
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, New York 10007-1312



Re: Clipper Steel Services, B.V., v. Gremio Unido De Aljadores S.C.
De R.L.
Docket No: (S.D.N.Y.) 07-10963 (PKC)
Our Ref. No. 695117-00603

Dear Judge Castel:

We represent plaintiff Clipper Steel Services, B.V. This is a by now familiar "Rule B" maritime attachment action. The merits of the dispute will be decided through litigation in Mexico. We refer to the Court's order of December 5, 2007, scheduling a pretrial conference for 10:45 a.m. on January 25, 2008, we respectfully request that the deadline for the joint letter five days in advance of the conference be adjourned 30 days to a day and time convenient to the Court while waiting to see if anyone appears for Defendant.

As to the conference, we would otherwise ask that it be adjourned for 30 days as well. However, based on the incident described below in which Citibank disobeyed the Court's Order of Attachment of December 3, 2007 ("Attachment Order"), we respectfully request that the Court, by so ordering this letter and directing us to send it by fax and email to Citibank, direct Citibank to appear at 10:45 a.m. on January 25, 2008, for a pre-motion conference. We ask the Court for an order directing Citibank to hold \$294,235.28 as of January 11, 2008, for the account of Plaintiff pending further order of the Court

Plaintiff seeks to recover for damages caused to a vessel by Defendant, a stevedoring company in Mexico. The Court issued Attachment Order on December 3, 2007, in the amount of \$299,235.28. We have been serving it on various banks in New York.

The Chrysler Building 405 Lexington Avenue New York, NY 10174-0208
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695117.00603/6606163v.1

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January 16, 2008
Page 2

On December 14, 2007, one of the garnishee banks, Wachovia, restrained \$5000. Wachovia advised us on December 17, 2007. Pursuant to Local Admiralty Rule B.2, we gave prompt notice of the attachment and the proceedings to Defendant.

To date, no attorney has appeared in New York for Defendant.

On Monday, January 14, 2008, another garnishee, Citibank, advised the undersigned that it had intercepted a transfer to Defendant in the amount of \$400,000. Citibank's General Counsel Office instructed Citibank staff to restrain \$299,235.28 and release the balance. One or more Citibank employees, however, contrary to the instruction from their General Counsel Office, released the entire amount.

Later on January 14, 2008, we demanded that Citibank confirm that it was holding \$294,235.28 (the balance after allowing for the \$5000 restrained by Wachovia) by close of business January 15, 2008. As of this writing, Citibank has not responded.

The story of this incident is stated in the enclosed email chain.

Defendant may have assets in the Southern District of Texas. Plaintiff has this week commenced a Rule B action there.

We respectfully request that the deadline for the joint letter be adjourned for 30 days, from January 17 to February 15 and that the pretrial conference be converted to a pre-motion conference regarding the relief Plaintiff requests from Citibank.

We are of course at the Court's disposal to answer any questions. Otherwise, we thank the Court in advance for its consideration of and favorable action upon this request.

Very truly yours,

A handwritten signature in cursive script, appearing to read "LeRoy Lambert".

LeRoy Lambert

LRL/mg

cc: By Email and Fax 1-646-291-1533 and 1-866-560-0633
Citibank – General Counsel Office
Attention of Mary Mihalik/Rodd Corner

for Jan 25
Conference adjourned
to February 22, 2008 at 9:30 am.
letter due five days
in advance
SO ORDERED.
[Signature]
USDJ
1-16-08